



EPA

40 years and moving forward

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

CERTIFIED MAIL

91 7108 2133 3932 0812 2005

August 21, 2013

RODNEY GIESIGE
SK HAND TOOL CORPORATION
135 HICKORY ST
DEFIANCE, OH 43512

**Re: 2010 Hazardous Waste Biennial Report Requirement – Notice of Violation
SK HAND TOOL CORPORATION, DEFIANCE - OHD045247350**

Dear RODNEY GIESIGE:

During a recent review of customer data from Ohio Treatment, Storage, and Disposal Facilities (TSDFs) it was noticed that one or more shipments of hazardous waste were received from SK HAND TOOL CORPORATION during the 2010 calendar year. The amounts reported, 202.73 tons, indicate that this site was a large quantity generator in 2010. Enclosed are printouts of the shipment information. Because I have not received a Hazardous Waste Biennial Report for 2010, SK HAND TOOL CORPORATION may be in violation of current federal and state laws concerning the generation, transportation and treatment of hazardous waste.

A large quantity generator is defined as a site which generates in any single month 1000 kg (2200 lbs.) or more of non-acute hazardous waste or 1 kg (2.2 lbs.) or more of acutely hazardous waste. This includes wastes from one-time generation as well as wastes from ongoing production processes. Generating hazardous waste at or above this amount for one or more months means that a facility is required to file a Hazardous Waste Report for the generating year in question. OAC Rule 3745-52-41 requires a generator who ships any hazardous waste off-site to prepare and submit to the Ohio EPA a Hazardous Waste Biennial Report and to describe and certify efforts that were made to minimize hazardous wastes. These reports are due March 1 of each even numbered year and must contain information about the activities of the previous calendar year. Only small quantity generators (between 220 and 2200 lb/mo of non-acutely hazardous wastes) and conditionally exempt small quantity generators (less than 220 lb/mo of non-acutely hazardous wastes) do not have to file the Biennial Report requirement as described in OAC Rule 3745-52-44.

SK HAND TOOL CORPORATION should have on file the manifest records necessary to complete this report. OAC Rule 3745-52-40 requires generators to keep a signed copy of each manifest for a period of at least three years from the date the waste was accepted by the initial transporter. Receiving facilities and transporters are under a similar requirement. If you need copies of the original manifest(s), contact them for assistance.

Generator Facility

Generator US EPA ID: OHD045247350
 Generator Name: SK Hand Tool Corp
 Address: 135 Hickory St
 Defiance, OH 43512-

Total Tons Shipped: 202.73

Receiving Facility

US EPA ID: OHD045243706
 Name: Envirosafe Services of Ohio Inc
 Customer Name: SK HANDTOOL
 Customer Address: 135 HICKORY STREET
 DEFIANCE, OH 43512-

Waste Description: NICKEL CHROME ELECTROPLATING SLUDGE

Page: 98

Subpage: 62

System Type: H132 Form: W505 Quantity: 22440.00 P Density:
 F006

Receiving Facility

US EPA ID: OHD020273819
 Name: Vickery Environmental Inc
 Customer Name: SK HAND TOOL CORP
 Customer Address: 135 HICKORY ST
 DEFIANCE, OH 43542-

Waste Description: SPENT HYDROCHLORIC ACID

Page: 23

Subpage: 1

System Type: H134 Form: W103 Quantity: 22.00 T Density:
 D006 D002

Waste Description: SPENT NITRIC ACID SOLUTION

Page: 23

Subpage: 1

System Type: H134 Form: W103 Quantity: 2.00 T Density:
 D002 D007

Waste Description: CHROMIC ACID

Page: 23

Subpage: 1

System Type: H134 Form: W103 Quantity: 39.00 T Density:
 F006 D002 D007

Waste Description: SODIUM HYDROXIDE SOLUTION

Page: 23

Subpage: 1

System Type: H134 Form: W103 Quantity: 24.00 T Density:
 D006 D002

Receiving Facility

US EPA ID: OHD980568992
 Name: Envrite of Ohio Inc
 Customer Name: SK HAND TOOL COMPANY
 Customer Address: 135 HICKORY ST.
 DEFIANCE, OH 43512-

Waste Description: LISTED METAL CONTAMINATED

Page: 166

Subpage: 1306

System Type: H111 Form: W501 Quantity: 128220.00 P Density: 8.35 Lbs. / Gal.
 D006 F006 D002 D007 D008

Waste Description: BASE LIQUID

Page: 166

Subpage: 1305

System Type: H111 Form: W110 Quantity: 62800.00 P Density: 8.35 Lbs. / Gal.
 D002 D007